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**Department of Energy**

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**MAR 02 1995**

95-SWT-147

Mr. Michael Wilson, Program Manager  
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State of Washington  
Department of Ecology  
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Mr. Doug R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
Region 10  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

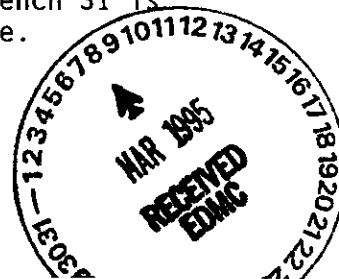
Dear Messrs. Wilson and Sherwood:

**DANGEROUS WASTE CODE F039 FOR THE RADIOACTIVE MIXED WASTE DISPOSAL FACILITY  
(218-W-5, TRENCH 31)**

The Radioactive Mixed Waste Disposal Facility is a Resource Conservation and Recovery Act (RCRA) compliant landfill located in the 218-W-5 Burial Ground, 200 West Area, of the Hanford Site. This unit is referred to as Trench 31. To ensure that the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) are informed on how leachate from Trench 31 will be managed, the following information is provided.

For the short term, leachate from Trench 31 will be shipped to the Double-Shell Tank System. Only wastes that have been tested for Trench 31 liner compatibility (9090 Testing), and are listed in the Hanford Facility Dangerous Waste Permit Part A, Form 3s for Low-Level Burial Ground and the leachate handling facilities will be accepted for disposal.

Recently, the Part A, Form 3s for the associated Hanford Facility unit specific treatment, storage, and disposal permit applications were modified to add F039 (derived from F001 through F005). However, the only listed waste that has been tested for liner compatibility is methylene chloride, which can be either F001 or F002 depending on use. Once additional liner compatibility testing is completed, Trench 31 will then accept a limited multiple listed waste (i.e. F001 through F005). Until these issues are resolved, Trench 31 is being limited to accepting listed waste containing methylene chloride.



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Messrs. Wilson and Sherwood

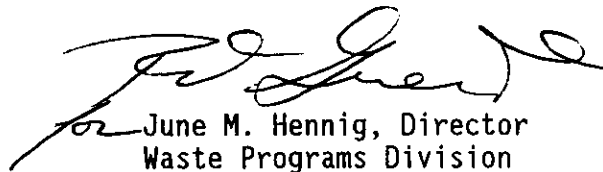
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The Federal Register (FR) Volume 55, No. 21, issued January 31, 1991, stated that leachate derived from the disposal of more than one listed hazardous waste would be designated as F039, a multi-source leachate. In order to assure compliance with land disposal restrictions and provide continuity of sampling between single-source and multi-source operations, any F039 waste generated will be analyzed by Westinghouse Hanford Company (WHC) Solid Waste Disposal Division (SWD) to determine what compounds are present.

The initial (baseline) analysis will check for all regulated constituents in F039. This approach is consistent with FR Volume 55, No. 106, issued June 1, 1990. SWD will be the responsible organization for obtaining an initial analysis of constituents in Trench 31 leachate. Based on the results of this analysis, and any other information that should be considered, SWD will develop a list of constituents to be analyzed on a regular frequency. This testing scheme will be supplemented with perhaps less frequent, broader analysis to make sure that changes in the composition of the leachate are detected as noted in the waste analysis plan. This approach will alleviate Hanford Facility treatment, storage and disposal units (e.g., Double-Shell Tank System) from conducting duplicate F039 testing as well as providing an accurate assessment of the waste constituents.

Should you have any questions regarding the startup of Trench 31 or the construction of Trench 34 please contact A. K. Crowell, RL, on (509) 372-2346 or Mr. R. D. Pierce, WHC, on (509) 372-0732.

Sincerely,



June M. Hennig, Director  
Waste Programs Division

WPD:AKC

cc: R. Cordtz, Ecology  
D. Duncan, EPA  
W. Hamilton, Jr., WHC  
J. Hensley, Ecology  
M. Jaraysi, Ecology  
D. Lundstrom, Ecology  
R. Pierce, WHC  
Administrative Records, H6-08